



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live*

*Evan Bayh*  
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February 8, 1993

**VIA CERTIFIED MAIL** P 323 805 483

Ms. Susan Sylvester  
U.S. EPA, Region V  
77 West Jackson Blvd.  
Chicago, Illinois 60604

D.2.1

RECEIVED  
FEB 12 1993  
OFFICE OF RCRA  
SITE MANAGEMENT

Dear Ms. Sylvester:

Re: RCRA Facility Investigation  
Supplement to Phase II Work Plan  
Franklin Power Products  
Franklin, Johnson County  
EPA I.D. No. IND 044587848

The Indiana Department of Environmental Management (IDEM) has reviewed Franklin Power Products' December 28, 1992, Supplement to the October 12, 1992, RCRA Facility Investigation (RFI) Phase II Work Plan ("SOP for Off-Site Geoprobe ground Water Sampling for CLP Analysis for the Former Amphenol Site RFI") and has the following comments:

1. It appears that CLP methods are being proposed. Analyses should follow SW-846 methods instead.
2. The plan proposes that two (2) groundwater samples be collected at any sampling location where the saturated unit thickness is four (4) feet or greater. It is not clear whether these samples will be taken at the same or different depths.
3. It is not clear what is meant by, "Soil samples will be retained and returned to the site for disposal." (Page 3) Describe specifically how and where the soil samples will be handled and disposed, and how it will be decided what constitutes proper disposal. Also clarify whether this sentence refers to soil samples or the entire cores.
4. Water for volatiles analysis should be withdrawn from borings using a stainless steel bailer.

Ms. Susan Sylvester, USEPA  
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5. Again, it is not clear what is meant by, "...water will be collected and discarded into a plastic container for return to the site and disposal,..." (Page 3) Describe specifically how and where the water will be handled and disposed, and how it will be decided what constitutes proper disposal.

6. It is unclear what exactly is being proposed under "Sampling Locations," on pages 4 and 5, by the sentence, "The latter sample will be used as a check against standard screened well bailer sampling that will also be conducted at MW-12."

7. On page 5, under "Equipment Decontamination," it is not specified how many DI water rinses will be performed after the Alconox wash.

If you have any questions regarding this matter, please contact Ms. Ruth Williams of my staff at 317/233-4623.

Sincerely,



Michael E. Sickels, Chief  
Corrective Action Section  
Hazardous Waste Management Branch  
Office of Solid and Hazardous Waste

RW/rgw

cc: Fayola Wright, USEPA  
William Buller, USEPA